

FRANKLIN EMPLOYMENT LAW GROUP
EUGENE T. FRANKLIN, CA SBN 124881
BARBARA F. GREEN, CA SBN 150320
Attorneys at Law
22762 Main Street
Hayward, California 94541
Direct (510) 538-0969; FAX (510) 538-6502

Attorneys for Plaintiff
TAMIKO OLABINTAN

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

TAMIKO OLABINTAN,

Plaintiff,

v.

SHURGARD STORAGE CENTERS, INC,
DOES 1 TO 30,

Defendants.

NO. U.S.D.C. C 04 2819 CRB (EMC)

SUBSEQUENT JOINT CASE MANAGEMENT
CONFERENCE STATEMENT

Date: June 9, 2006
Time: 8:30 a.m.
Dept. 8, 19th Floor

Plaintiff Tamiko Olabintan and Defendant Shurgard Storage Center, Inc., submit this Subsequent Joint Case Management Statement and Proposed Order.

1. **STATUS OF PARTIES:** Due to complications with her pregnancy, plaintiff was disabled and unable to participate in the litigation from about August 3, 2005, through about March 31, 2006.

2. **ALTERNATE DISPUTE RESOLUTION:** The parties held a mediation on July 18, 2005. The case did not settle. Follow-up is not contemplated.

3. **DISCOVERY:** The parties have had discovery disputes since the last case management conference..

On January 27, 2006, Magistrate Judge Chen issued an Order Granting in Part and Denying in Part Plaintiff's Motion for Protective Order.

On May 25, 2006, the parties filed a Joint Letter Re: Discovery Disputes requesting a telephone conference with Magistrate Chen. On May 30, 2006, the case was referred to Magistrate Judge Chen for a telephone conference concerning the parties' discovery disputes over a third deposition of plaintiff and written discovery.

The parties intend to take several depositions in California and in Washington between June 19, 2006 and December 2006.

4. **TRIAL SCHEDULE:** The parties anticipate that the case will be ready to be set for trial at the next case management conference.

IT IS SO STIPULATED.

Dated: May 31, 2006

FRANKLIN EMPLOYMENT LAW GROUP

/s/
By: _____
Eugene T. Franklin
Barbara F. Green
Attorneys for Plaintiff Tamiko Olabintan

Dated: May 31, 2006

LYNCH, GILARDI & GRUMMER

/s/
By: _____
Ronald J. Souza, Esq.
Lara S. Hilley, Esq.
Attorneys for Shurgard Storage Centers, Inc.

~~(PROPOSED)~~ ORDER

Pursuant to stipulation and upon good cause, the Court orders that the Case be continued for a
15,
Subsequent Case Management Conference in December 2006.

Dated: June 2, 2006

